The Trade Desk

Privacy Policy for The Trade Desk Demand Side Platform Offered by Cui Yi

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Your personal information is important. Cui Yi Information Science and Technology (Shanghai) Co., Ltd. (Room 05-08, 17/F, No. 669 Xinzha Road, Jingan District, Shanghai, hereinafter referred to as **"we"**, **"us"**, **"our"** or **"Cui Yi"**) understands the importance you and your end users place on personal information, and we make every effort to maintain its security and reliability. This Privacy Policy only applies to individuals who reside in the People's Republic of China. If you do not reside in the People's Republic of China, please follow the links and review the information provided in our Global Policy.

In this Privacy Policy, "you" refers to our clients, i.e., companies that purchase or use our platform, including but not limited to advertisers, media, advertising agencies, etc. "End users" refers to your users, i.e., individuals served by our platform or service.

We comply with the basic principles of personal information protection as provided in the Personal Information Protection Law of the People's Republic of China, such as the principles of legality, propriety, integrity, minimum necessity, and openness and transparency. Meanwhile, to maintain your trust, we undertake to adopt corresponding security measures to protect your and your end-user personal information in accordance with provisions of the Personal Information Protection Law of the People's Republic of China, the Cybersecurity Law of the People's Republic of China, the Data Security Law of the People's Republic of China, the Civil Code of the People's Republic of China, and other laws and regulations in connection with the Internet industry regarding personal information protection, and with reference to the Information Security Technology – Personal Information Security Specification (GB/T 35273-2020) and other voluntary national standards.

This Privacy Policy applies only to the advertising service platform offered by Cui Yi, i.e., The Trade Desk Demand Side Platform (the **"Platform"**), a digital advertising platform that helps advertisers manage their various online channels. For other products or services Cui Yi offers, you should read the applicable privacy policies Cui Yi has separately formulated and published. For information on third-party platforms to which the Platform links or directs, or technology provided by third parties, you should read and comply with the terms, documents, and privacy policies formulated and published by such third parties.

Before using our products or services, please read carefully and fully understand this Privacy Policy. We use bold text to remind you of certain key provisions in this Privacy Policy. By using our products or services, you confirm that you have read and fully understand this Privacy Policy. When you provide services to your end users via our products or services, you must separately disclose to these users a privacy policy in accordance with applicable laws and regulations. Cui Yi is not liable for the services you provide to your end users. You must consent to the terms of this Privacy Policy and ensure that your end users also do so. If you do not consent or fail to require your end users to consent to the terms of this Privacy Policy, you must immediately cease use of Cui Yi's products and services.

This Privacy Policy contains the following eight sections:

1. Our collection and use of personal information
2. How we share, transfer, and publicly disclose personal information
3. How individuals manage their personal information
4. How we protect personal information
5. How we store personal information
6. Protection of minors
7. Updates to this Privacy Policy
8. Contact us

1. Our Collection and Use of Personal Information

（1） End-user personal information

The products and services we provide rely on certain forms of personal information. When you use our products or services, you may entrust us to handle any personal information you provide. As to the collection and provision of personal information, you must: (i) ensure that you have complied with relevant laws, regulations, and national standards; (ii) notify the end users of the collection and use of their personal information (including a description of the collection and use of personal information from and relating to end users for advertising purposes by third parties such as Cui Yi); (iii) obtain the prior consent of your end users; and (iv) provide end users with options to turn off and opt-out with respect

to personal information collection that applies to Cui Yi. You must also desensitize and encrypt any personal information you provide to us, to ensure that the processed information does not identify or re-identify a particular individual.

The Platform can be used to provide personalized advertising, limiting the number of times an end user views an advertisement, monitor the advertising effectiveness, advertising behavior analysis and attribution, device correlation, and prevention of fraud and illegal practices, etc.

When you use the Platform, we collect your end-user personal information, including unique cookies and device identifiers (such as IMEI, MEID, Android ID, MAC, OPENUDID, GUID, OAID, VAID, UAID, etc.), mobile device advertising identifiers (such as IDFA), IP addresses, web browsing history, interest information inferred from web browsing history, interest information you store or use on the Platform, **location information**, browser and device types, versions, and settings, de-identified e-mail addresses and other identifying information, and other information derived therefrom.

（2） Personal information we may collect without authorization and consent

In addition, in accordance with relevant laws, regulations, and national standards, we may collect and use personal information without an individual's prior authorization and consent where:

a) the personal information is relevant to the performance of our statutory obligations;

b) the personal information is directly related to national security and defense security;

c) the personal information is directly related to public security, public health, or vital public interests;

d) the personal information is directly related to a criminal investigation, prosecution, trial, or the execution of judgments;

e) the personal information is collected for purposes of an individual's material legitimate interests, such as life and property, and it is difficult to obtain authorization and consent from the individual;

f) the personal information involved is publicly disclosed by the individual;

g) the personal information is necessary for us to enter into or perform contracts in accordance with the individual's instructions;

h) the personal information is collected from lawfully disclosed information, such as legitimate news reports, government information disclosures, and other channels;

i) the personal information is necessary to maintain secure and stable operation of products or services, such as detecting or disposing of product or service malfunctions.

（3） **How we use cookies and similar technologies**

Cookies help us to distinguish, recognize, and store data across browsers and devices and to store this data on our servers for use in advertising purposes. Cookies can be managed by changing your browser settings.

The Trade Desk ID **("TDID")** is the primary cookie ID we use to recognize web-browser profiles over time across sites. The TDID has a lifespan of one year from the time an advertisement is served to an end user through the Platform.

We engage in cookie syncing, which means that we match our cookie IDs to the cookie IDs of our clients and partners. We do this to enable transmission of advertisement requests and other data about users or devices between sellers and buyers, and to help show you advertisements that match the likely interests of your end users.

（4） Personal information about your end users that we collect from third parties

To provide the Platform, we collect personal information about your end users from third parties. Some of the ways include:

a) from partners sending us requests for advertisements on websites, mobile applications, smart televisions, video devices, and other media;

b) from you and our partners uploading data to the Platform; and

c) from you and our partners using our technology to collect data.

2. How We Share, Transfer, and Publicly Disclose Personal Information

（1） Sharing

We will not share personal information about your end users with any company, organization, or individual, except under the following circumstances.

a) Sharing upon consent: we may share personal information with other parties upon

your end-user consent.

b) Sharing under statutory circumstances: we may share personal information in accordance with the provisions of laws and regulations or the mandatory requirements of judicial departments and competent government departments.

c) Sharing with our affiliate companies: we may share personal information with Cui Yi's affiliates, subject to the purposes stated in this Privacy Policy.

d) Sharing with authorized partners: we may share personal information with third-party partners to provide better customer service and user experiences, solely for the purposes stated in this Privacy Policy. This personal information may include the identifiers described herein, such as device and cookie IDs. We will only share such personal information for legal, proper, necessary, specific, and identifiable purposes, and the personal information necessary to provide services.

Please note that we sign strict confidentiality agreements with the companies and organizations with whom we share personal information, which require them to handle shared personal information in accordance with our instructions and for the purposes or uses set forth in this Privacy Policy and in accordance with confidentiality and security measures. In accordance with applicable laws, we may handle shared personal information without notice to or consent of your end users if we adopt technical and other necessary measures to de-identify the personal information so that the third-party recipients are unable to re-identify such individuals and cannot recover the personal information.

（2） Transfer

We will not transfer personal information about your end users to any company, organization, or individual, except under the following circumstances.

a) We obtain your end-user prior consent.

b) Your end users have publicly disclosed such personal information voluntarily, or we obtain the personal information from other lawful public channels.

c) With the development of our business, in case of merger, acquisition, or bankruptcy, in connection with the transfer of personal information, we may require the new company or organization that holds the personal information to continue to be bound by this Privacy Policy. If there is any change to the manner in which personal information is collected or handled under this Privacy Policy, the company or organization concerned will separately seek the individuals' authorization and consent.

（3） Public Disclosure

Subject to applicable laws and regulations, we will not publicly disclose personal information about your end users unless we have obtained their prior consent.

（4） Personal information we may share, transfer, or publicly disclose without authorization and consent

In addition, in accordance with relevant laws, regulations, and national standards, we may share, transfer, or publicly disclose personal information without an individual's prior authorization and consent where:

a) the personal information is relevant to the performance of our statutory obligations;

b) the personal information is directly related to national security and defense security;

c) the personal information is directly related to public security, public health, or vital public interests;

d) the personal information is directly related to a criminal investigation, prosecution, trial, or the execution of judgments;

e) the personal information is collected for purposes of an individual's material legitimate interests, such as life and property, and it is difficult to obtain authorization and consent from the individual;

f) the personal information involved is publicly disclosed by the individual;

g) the personal information is necessary for us to enter into or perform contracts in accordance with the individual's instructions;

h) the personal information is collected from lawfully disclosed information, such as legitimate news reports, government information disclosures, and other channels;

i) the personal information is necessary to maintain secure and stable operation of products or services, such as detecting or disposing of product or service malfunctions.

3. How Individuals Manage Personal Information

（1） For end users

We do not directly interact with end users. End users should send any requests related to personal information directly to our clients for handling and assistance in accordance with their privacy policies. We will actively cooperate and respond to such requests once we receive them from our clients and verify their authenticity and legitimacy.

（2） Responding to end-user requests

In principle, we do not charge any fees for reasonable requests made by your end users. We may deny requests that are repetitive, require excessive technology assistance (for example, require the development of new systems or fundamental changes to the existing practices), create risks to the legitimate rights or interests of others, or are impractical (for example, involve information stored on backup tapes).

We may not respond to end-user requests under the following circumstances:

a) where they are relevant to the performance our statutory obligations;

b) where they are directly related to public security, public health, or vital public interests;

c) where we have sufficient evidence to show that the end users have acted in bad faith or have abused their rights;

d) where it is for the purpose of protecting an individual's material legitimate interests, such as life and property, and it is difficult to obtain the prior consent of the individual;

e) where the response to an end-user request would cause serious damage to the legitimate interests of any individual or organization; and

f) where the request involves trade secrets.

4. How We Protect Personal Information

We have adopted various security measures to protect personal information, including but not limited to physical, electronic, and administrative safeguards, to prevent unauthorized access, loss, misuse, or tampering with such information collected on the Platform. Nevertheless, the Internet is not an absolutely secure environment. Although we have made necessary and reasonable efforts, there is a risk that the theft, illegal

ownership or possession, or misuse of your personal information could result in personal, property, or reputational harm to you and your end users. We have mainly adopted the following security measures.

（1） We will strengthen the security capabilities of the Platform through continuous improvement of technical measures to prevent your personal information from being leaked. For example, we will encrypt your personal information when it is transmitted.

（2） We will adopt all reasonable and feasible measures to ensure that the collected personal information and purpose of use have the corresponding authorizations, and to ensure that no irrelevant personal information is collected. We will only retain your and your end-user personal information for the period required to achieve the purpose stated in this Privacy Policy in accordance with the laws and regulations.

（3） In order to prevent fraud, identity theft, impersonation, and other illegal activities, or to conduct security checks, we may analyze and use unique device identifiers, login IP addresses, operation logs, location information, and other data so as to adopt security measures or send security alerts.

（4） We will regularly update and disclose the relevant contents of security risk reports, personal information security impact assessments reports, and other reports.

（5） We have established special management systems, processes, and organizations to protect the security of personal information. For example, we strictly limit the scope of personnel who have access to personal information, require them to comply with confidentiality obligations, and conduct audits.

（6） In the event of personal information security incident, we will initiate an emergency response plan to mitigate its effects. We will also inform you of the security incidents via email, bulletins, or other means, and disclose to you the basic circumstances of the incident and its potential impact, measures we have adopted or will adopt to deal with the incident, suggestions for how you can prevent and reduce risk, and remedial measures we have taken. In the meantime, we will handle personal information security incidents in accordance with the requirements of regulatory authorities.

5. How We Store Personal Information

（1） Where we store personal information

We will store in China your end-user personal information collected in China in accordance with laws and regulations. If the personal information is to be transferred abroad for storage, we will strictly follow your instructions and applicable laws and regulations.

Please note that Cui Yi bears no risk or liability in relation to cross-border transfers of personal information you provide in connection with your use of the Platform. You are responsible for handling all disputes, penalties, complaints, or losses arising from such transfers and for resolving any legal or other actions to which Cui Yi may be subject, such as third-party complaints, penalties, litigation, or other disputes. You agree to indemnify Cui Yi for any losses which arise from any of the foregoing.

（2） How long we store personal information

We will store personal information you provide only for the purposes described in this Privacy Policy or as you or your end users authorize, and for the minimum period of time required by laws and regulations. Thereafter, we will delete or anonymize your personal information.

In the event of suspension of operations of any of our products or services, we will notify you through appropriate channels (i.e., email or public announcement) and delete or anonymize your personal information within a reasonable period of time.

6. Protection of Minors

We attach great importance to the protection of minors' personal information.

According to the agreement between you and Cui Yi, you are prohibited from providing to the Platform any personal information of a minor under the age of 14.

Given the limitations of the current technology and our business model, it is difficult for us to actively identify minors' personal information. If you find that we have inadvertently handled a minor's personal information, you can contact us immediately through the contact information disclosed in the Privacy Policy and request the deletion of the minor's personal information, and we may delete such information in accordance with the applicable laws and regulations.

7. Updates to this Privacy Policy

We may revise this Privacy Policy from time to time as our business changes. When there is any change to the terms of this Privacy Policy, we will publish the revised version on our official website or otherwise remind you of the revised contents in an appropriate manner before the revised terms take effect so that you can be informed of the latest version of this Privacy Policy. Such revisions are considered part of the Privacy Policy and shall have the same force and effect as this Privacy Policy.

We recommend that you read and understand this Privacy Policy from time to time to better understand the policies that you are obligated to comply with. If you do not agree to terms of this Privacy Policy, please cease to access this website and use our services.

We will also retain earlier versions of this Privacy Policy on file for your reference.

8. Contact Us

If you have any complaints or suggestions, or if you have questions relating to minors' personal information, please contact us through our official website. You may also send your questions to dsr@thetradedesk.com.

We will review questions as soon as possible and reply to you within a reasonable time period in accordance with the law (you may be requested to provide additional information or otherwise establish your identity).